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*Attorneys for Defendant  
Gravitas Nevada Ltd. d/b/a The Apothecarium*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

DANIEL DRAPER, individually and on behalf  
of others similarly situated,

Plaintiff,

v.

RHMT, LLC. d/b/a THE APOTHECARIUM,  
et al.,

Defendants.

Case No.: 2:20-CV-01423-GMN-VCF

**UNOPPOSED MOTION  
FOR EXTENSION OF TIME TO  
ANSWER OR OTHER RESPONSIVE  
PLEADING ON BEHALF OF  
DEFENDANT GRAVITAS NEVADA LTD.  
d/b/a THE APOTHECARIUM  
AND ORDER**

Defendant Gravitas Nevada Ltd. d/b/a The Apothecarium (“Gravitas”), by and through counsel, moves the court for a fourteen-day extension of time to file an Answer or other responsive pleading to Plaintiffs’ Amended Complaint for Damages and Injunctive Relief Pursuant to the Telephone Consumer Protection Act, 47 U.S.C. § 227 et seq. (“Amended Complaint”) in the above-captioned case. In support of this unopposed Motion, Gravitas states:

1. Gravitas’ current deadline to respond to the Amended Complaint is November 3, 2020.
2. No prior extensions have been sought by, or granted to, Gravitas.

1           3.       Gravitas' counsel needs additional time to review and investigate the allegations  
2 in the Amended Complaint and attempt to resolve the purported dispute.

3           4.       This motion is not made for purposes of hindrance or delay.

4           5.       Plaintiff's counsel was consulted and does not oppose this motion for an  
5 additional fourteen-day extension for Gravitas to file an Answer or other responsive pleading to  
6 the Amended Complaint. If granted, Gravitas will have up to, and including, November 17,  
7 2020, to file an Answer or other responsive pleading to the Amended Complaint.

8           WHEREFORE, Defendant Gravitas Nevada Ltd. d/b/a The Apothecarium requests that  
9 the Court enter an Order granting this unopposed Motion for an additional fourteen days to file  
10 an Answer or other responsive pleading to the Amended Complaint, and for any further relief the  
11 Court deems just and proper.

12           Dated: November 3, 2020.

ARMSTRONG TEASDALE LLP

13  
14  
15           By: /s/ Jeffrey F. Barr  
16               JEFFREY F. BARR, ESQ.  
17               NV Bar No. 7269  
18               3770 Howard Hughes Parkway  
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*Attorneys for Defendant  
Gravitas Nevada Ltd. d/b/a The  
Apothecarium*

21  
22           **ORDER**

23           IT IS SO ORDERED.

24             
25           \_\_\_\_\_  
26           UNITED STATES MAGISTRATE JUDGE

27           \_\_\_\_\_  
28           Dated this 3rd day of November, 2020.

**CERTIFICATE OF SERVICE**

Pursuant to Fed. R. Civ. P. 5 (b), and section IV of District of Nevada Electronic Filing Procedures, I certify that I am an employee of ARMSTRONG TEASDALE LLP, and that the foregoing Unopposed Motion for Extension of Time to Answer or Other Responsive Pleading on Behalf of Defendant Gravitas Nevada Ltd. d/b/a The Apothecarium and Order was served:

☒ via electronic service to the address(es) shown below:

[Gustavo@kazlg.com](mailto:Gustavo@kazlg.com)

*Counsel for Plaintiff Daniel Draper and the Putative Class*

☐ via the U.S. Postal Service at Las Vegas, Nevada, in a sealed envelope, with first-class postage prepaid, on the date and to the address(es) shown below:

Gustavo Ponce, Esq.  
KAZEROUNI LAW GROUP, APC  
6069 South Fort Apache Road, Suite 100  
Las Vegas, Nevada 89148

*Counsel for Plaintiff Daniel Draper and the Putative Class*

Date: November 3, 2020.

/s/ Jessica Myrold

An employee of Armstrong Teasdale LLP